



February 17, 2015

Chairman Mary Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

RE: 2015 LCFS Readoption

Dear Chairman Nichols,

As stated in prior comments, White Energy is an ethanol producer that has three facilities located in Kansas and Texas. We support the re-adoption of the Low Carbon Fuel Standard (LCFS) and commend California ARB for moving the program forward. We appreciate all of staff's hard work and the openness of the workshops leading up to the issuance of the proposed regulation order, allowing stakeholders to better understand the re-adoption process and development of the proposed regulation order.

We would suggest that fuel pathways voluntarily registered under the Biofuel Producer Registration system prior to the effective date of the new proposed regulation order all have the same deactivation schedule under Section 95488(a) regardless of the certification date or application date. Due to the decreased iLUC factor alone, it will be beneficial as an ethanol producer to immediately apply for a new certified pathway under the readopted regulation. However, considering the sheer volume of all new certifications that will need to occur across the program, the uncertainty of being able to obtain the new certifications prior to the effective date is a concern.

As stated in prior comments, we feel sorghum plays an important role in helping California meet the greenhouse gas reduction goals set by the LCFS and reducing water usage on irrigated acres. We support the comments of the National Sorghum Producers applauding the ARB for its special attention to sorghum iLUC, sorghum fertilizer requirements and N<sub>2</sub>O emissions from sorghum stover. We also recommend that the ARB focus attention on information related to sorghum root:shoot ratios, and as it becomes available, incorporate this information into future versions of CA-GREET.

White Energy desires to part of the solution by providing low carbon fuels to help ARB meet its goals to reduce greenhouse gas emissions through the LCFS program.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Carol Tjiong".

Carol Tjiong  
Vice President